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U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

December 13, 2021

BY ECF

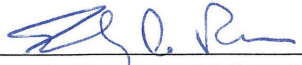
The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **United States v. James Bazemore, 20 Cr. 573 (ER)**

Dear Judge Ramos:

A jury trial is scheduled to commence on July 11, 2022 at 9:30 am. Motions in limine, proposed voir dire, jury instructions and verdict sheet are due June 13, 2022. Responses thereto are due June 27, 2022. A final pretrial conference will be held on July 7, 2022 at 3:30 p.m. Speedy trial time is excluded from, January 31, 2022, until July 11, 2022, in the interest of justice.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 12/21/2021
New York, New York

The Government respectfully submits this letter with the consent of Matthew Myers, Esq., counsel to defendant James Bazemore, to request an adjournment of the upcoming trial date, final pretrial conference, and dates for pre-trial filings in the above-referenced case. The current trial date is January 31, 2022.

The parties have been in discussions regarding a resolution concerning this case and other conduct that the Government is presently investigating, and in connection with those discussions, the Government has reviewed evidence with defense counsel related to the Government's ongoing investigation. In light of these discussions, the parties jointly request that the Court adjourn the trial date; the date of the final pretrial conference; and the date for filing motions *in limine*, request to charge, and proposed *voir dire* questions, for approximately ninety days. Additionally, in light of the parties' discussions concerning a resolution of this case prior to trial, the Government requests that the time between the date of this letter and the next scheduled conference date be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interest of justice.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____/s_____
Christopher D. Brumwell
Assistant United States Attorney
212-637-2477

cc: Matthew Myers, Esq. (by ECF and email)